

TEST REPORT

Applicant Name: McGrath Locks PTY LTD
Address: 4/36 Windorah St, Stafford Qld 4053, Australia
Report Number: 2504Z27522E-RF-00B
FCC ID: 2BTTC-ML-ASCOT

Test Standard (s)

FCC PART 15.225

Sample Description

Product Name: Digital Lock
Model No.: ML-Ascot
Trade Mark: 
Date Received: 2025-12-17
Report Date: 2026-04-14

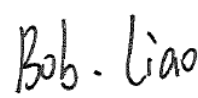
Test Result:	The EUT complied with the standards above.
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Prepared and Checked By:



Jason Fan
EMC Engineer

Approved By:



Bob.Liao
EMC Engineer

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DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
Rev.00	2504Z27522E-RF-00B	Original Report	2026-04-14

GENERAL INFORMATION

Product Description for Equipment under Test (EUT)

Product Name	Digital Lock
Tested Model	ML-Ascot
Voltage Range [#]	DC 6V from battery
Frequency Range	13.56 MHz
Modulation Technique	ASK
Maximum E-Field Strength (Peak)	67.04dBuV/m@3m
Antenna Specification [#]	Internal Antenna (It is provided by the applicant.)
Sample Serial Number	3DJ4-3 (Assigned by ATC, Shenzhen)
Sample/EUT Status	Good condition

Objective

This Type approval report is in accordance with Part 2- Subpart J, and Part 15-Subparts A and C of the Federal Communication Commissions rules.

The objective is to determine the compliance of the EUT with FCC rules, section 15.203, 15.205, 15.209 and 15.225.

Test Methodology

All measurements contained in this report were conducted with ANSI C63.10-2020, American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices.

Unless otherwise stated there are no any additions to, deviations, or exclusions from the method.

Test Facility

The test site used by Shenzhen Accurate Technology Co., Ltd. to collect test data is located on the Floor 1, KuMaKe Building, Dongzhou Community, Guangming Street, Guangming District, Shenzhen, Guangdong, China.

Accredited by American Association for Laboratory Accreditation (A2LA).The Certificate Number is 4297.01.

Measurement Uncertainty

Parameter		Uncertainty
RF Frequency		0.064*10 ⁻⁷
Emissions, Radiated	9kHz - 30MHz	2.1 dB
	30MHz - 1GHz	4.3 dB
Temperature		1 °C
Humidity		2 %
Supply voltages		0.4 %

Note: The extended uncertainty given in this report is obtained by combining the standard uncertainty times the coverage factor K with the 95% confidence interval. Otherwise required by the applicant or Product Regulations, Decision Rule in this report did not consider the uncertainty.

SYSTEM TEST CONFIGURATION

Description of Test Configuration

The system was configured for testing in a typical fashion (as normally used by a typical user).

EUT Exercise Software

No Exercise Software was used.

Equipment Modifications

No modification on the EUT.

Support Equipment List and Details

Manufacturer	Description	Model	Serial Number
McGrathLocks	Magnetic card [#]	Unknown	Unknown

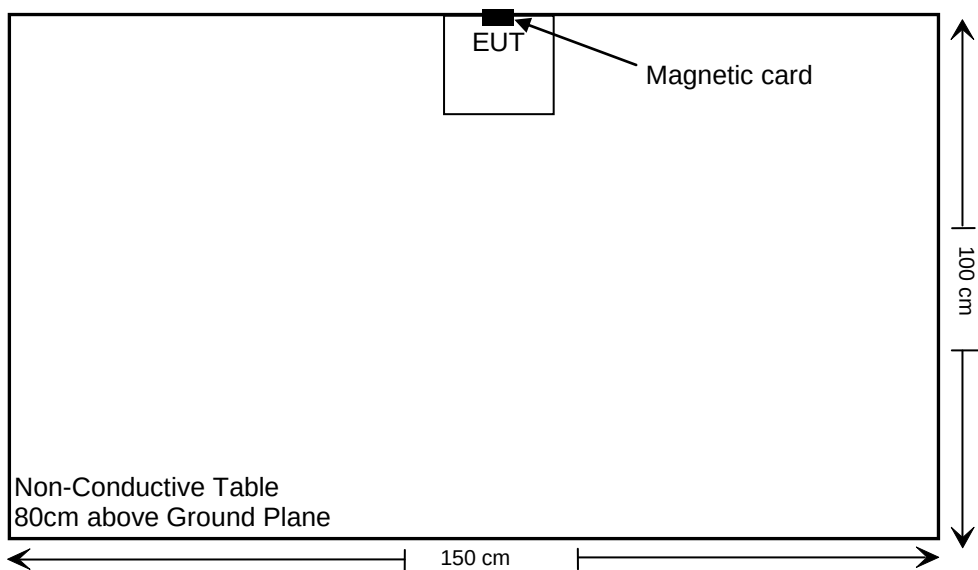
External I/O Cable

Cable Description	Shielding Type	Length (m)	From Port	To
/	/	/	/	/

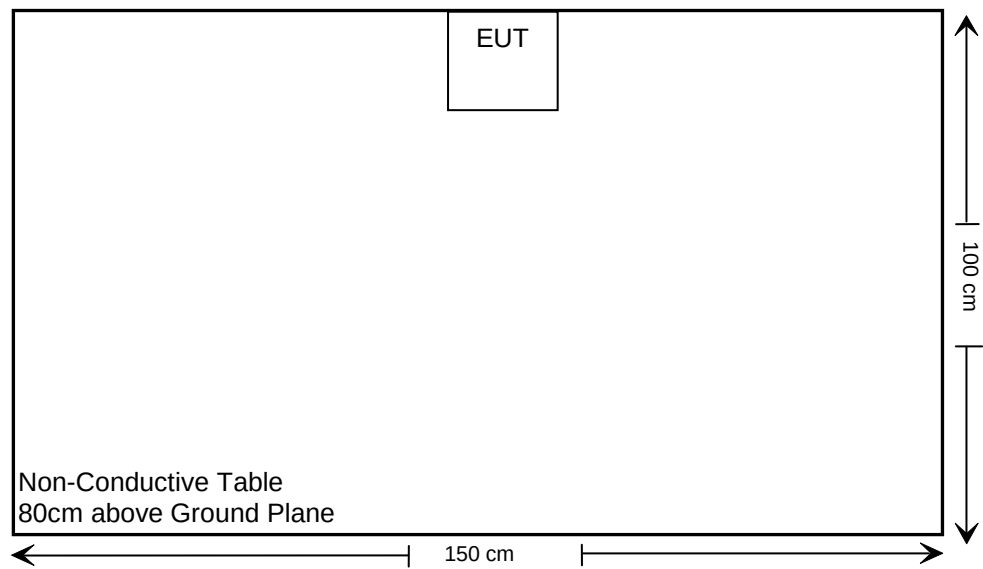
Block Diagram of Test Setup

For Radiated Emission Below 1GHz:

With Magnetic card



Without Magnetic card



SUMMARY OF TEST RESULTS

FCC Rules	Description of Test	Result
§15.203	Antenna Requirement	Compliance
§15.207	AC Line Conducted Emission	Not Applicable
§15.225 §15.209, §15.205	Radiated Emission Test	Compliance
§15.225(e)	Frequency Stability	Compliance
§15.215(c)	20dB Emission Bandwidth	Compliance

Not Applicable: The EUT is powered by battery.

TEST EQUIPMENT LIST

Manufacturer	Description	Model	Serial Number	Calibration Date	Calibration Due Date
Rohde & Schwarz	Test Receiver	ESR	102725	2025/09/18	2026/09/17
SONOMA INSTRUMENT	Amplifier	310 N	186131	2025/03/26	2026/03/25
Unknown	RF Coaxial Cable	No.12	N040	2025/05/30	2026/05/29
Unknown	RF Coaxial Cable	No.13	N300	2025/05/30	2026/05/29
Unknown	RF Coaxial Cable	No.14	N800	2025/05/30	2026/05/29
BACL	LOOP ANTENNA	1313-1A	3110711	2024/01/16	2027/01/15
Schwarzbeck	Bilog Antenna	VULB9163	9163-323	2024/08/08	2027/08/07
Unknown	RF Coaxial Cable	No.40	/	2025/05/30	2026/05/29
UNI-T	DC Power Supply	UTP1306S	2109D0903324	2025/03/26	2026/03/25
BACL	Temp. & Humid. Chamber	BTH-150-40	30192	2025/09/18	2026/09/17
Test Software: e3 191218 (V9)					

*** Statement of Traceability:** Shenzhen Accurate Technology Co., Ltd. attests that all calibrations have been performed in accordance to requirements that traceable to National Primary Standards and International System of Units (SI).

ANTENNA REQUIREMENT

Applicable Standard

According to FCC§15.203:

An intentional radiator shall be designed to ensure that no antenna other than that furnished by the responsible party shall be used with the device. The use of a permanently attached antenna or of an antenna that uses a unique coupling to the intentional radiator shall be considered sufficient to comply with the provisions of this section.

Antenna Connected Construction

The EUT has one internal antenna arrangement for NFC, which was permanently attached, fulfill the requirement of this section. Please refer to the EUT photos.

Result: Compliance.

RADIATED EMISSIONS TEST

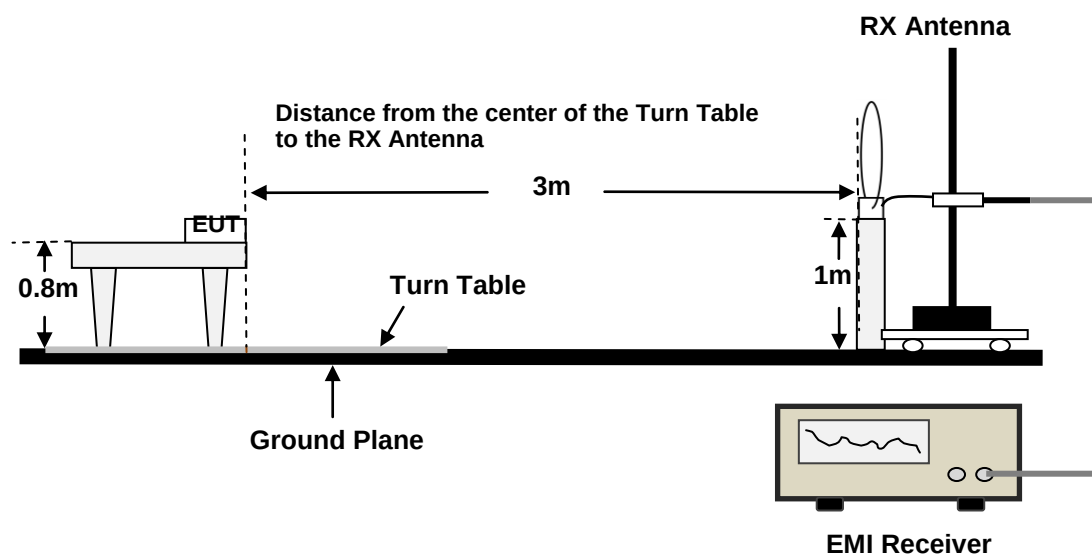
Applicable Standard

According to FCC Part 15.225, §15.205& §15.209:

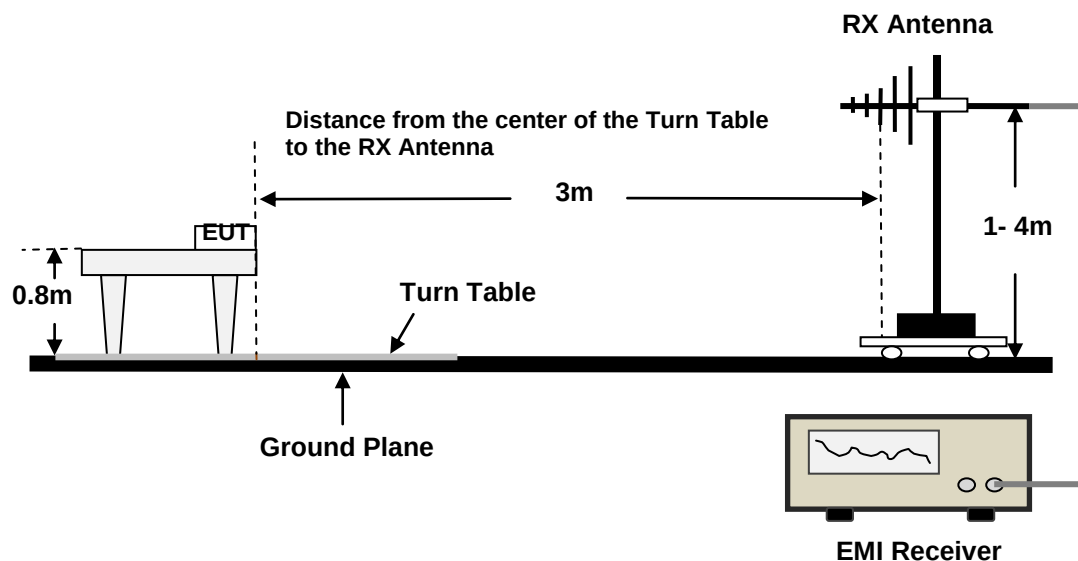
- (a) The field strength of any emissions within the band 13.553–13.567 MHz shall not exceed 15,848 microvolts/meter at 30 meters.
- (b) Within the bands 13.410–13.553 MHz and 13.567–13.710 MHz, the field strength of any emissions shall not exceed 334 microvolts/meter at 30 meters.
- (c) Within the bands 13.110–13.410 MHz and 13.710–14.010 MHz the field strength of any emissions shall not exceed 106 microvolts/meter at 30 meters.
- (d) The field strength of any emissions appearing outside of the 13.110–14.010 MHz band shall not exceed the general radiated emission limits in §15.209.

EUT Setup

9kHz - 30MHz:



30MHz - 1GHz:



The radiated emission tests were performed in the 3-meter chamber a test site, using the setup accordance with the ANSI C63.10-2020. The specification used was the FCC Part Subpart C limits.

EMI Test Receiver Setup

According to FCC Rules, 47 CFR 15.33, the EUT emissions were investigated up to 1000 MHz.

During the radiated emission test, the EMI test Receiver was set with the following configurations:

Frequency Range	Measurement	RBW	Video B/W	IF B/W	Detector
9kHz - 150kHz	PK	0.3kHz	1kHz	/	PK
	QP/AV	/	/	200Hz	QP/AV
150kHz - 30MHz	PK	10kHz	30kHz	/	PK
	QP/AV	/	/	9kHz	QP/AV
30MHz - 1000MHz	PK	100kHz	300kHz	/	PK
	QP	/	/	120kHz	QP

Test Procedure

Maximizing procedure was performed on the highest emissions to ensure that the EUT complied with all installation combinations.

The emission limits shown in the above table are based on measurements employing a CISPR quasi-peak detector except for the frequency bands 9–90 kHz, 110–490 kHz and above 1000 MHz. Radiated emission limits in these three bands are based on measurements employing an average detector.

According to FCC §15.209(e), the provisions in §15.31, 15.33, and 15.35 for measuring emissions at distances other than the distances specified in the above table, determining the frequency range over which radiated emissions are to be measured, and limiting peak emissions apply to all devices operated under this part.

According to FCC§15.31 measurement standard (f)(2), at frequencies below 30 MHz, measurements may be performed at a distance closer than that specified in the regulations; however, an attempt should be made to avoid making measurements in the near field. Pending the development of an appropriate measurement procedure for measurements performed below 30 MHz, when performing measurements at a closer distance than specified, the results shall be extrapolated to the specified distance by either making measurements at a minimum of two distances on at least one radial to determine the proper extrapolation factor or by using the square of an inverse linear distance extrapolation factor (40 dB/decade). This paragraph (f) shall not apply to Access BPL devices operating below 30 MHz.

For 9kHz-30MHz, test distance is 3m, extrapolation limit shall be calculated using Equation:

$$E_{\text{limit-measure}} = E_{\text{limit-Standard}} + 40 \times \log_{10}\left(\frac{d_{\text{Standard}}}{d_{\text{measure}}}\right)$$

Note 1: If the maximized peak measured value is under the QP/Average limit by more than 6dB, then it is unnecessary to perform an QP/Average measurement.

Note 2: For above 1GHz, the test result of peak was 20dB below to the limit of peak, which can be compliant to the average limit, so just peak value was recorded.

Calculation

The Factor is calculated by adding the Antenna Factor and Cable Loss, and subtracting the Amplifier Gain. The basic equation is as follows:

Factor = Antenna Factor + Cable Loss - Amplifier Gain

The “**Over Limit/Margin**” column of the following data tables indicates the degree of compliance with the applicable limit. For example, an over limit/margin of -7dB means the emission is 7dB below the limit. The equation for calculation is as follows:

Over Limit/Margin = Level / Corrected Amplitude – Limit
Level / Corrected Amplitude = Read Level + Factor

Test Data

For Radiated Spurious Emissions, this device is installed vertically in X-axes orientation. It was provided by applicant. The X-axes orientation was tested and recorded in the report.

9kHz-1GHz

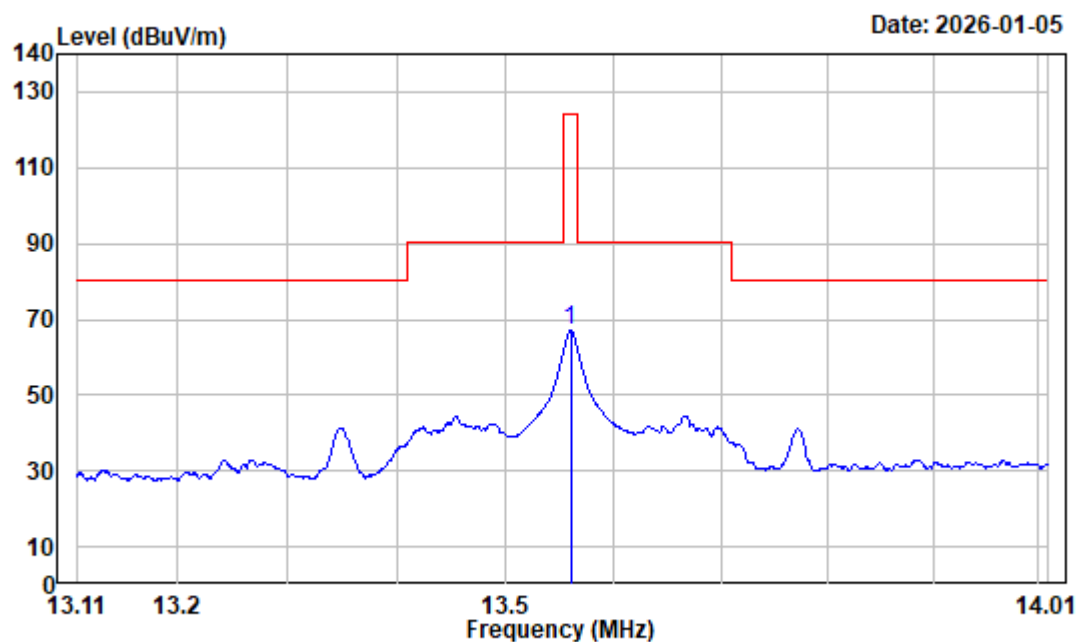
Environmental Conditions

Temperature:	21.2 °C
Relative Humidity:	50 %
ATM Pressure:	101.8 kPa
Test Engineer:	Jayden Luo
Test Date:	2026-01-05
EUT Operation Mode:	NFC Transmitting

Test Result: Compliance, please refer to the below data.

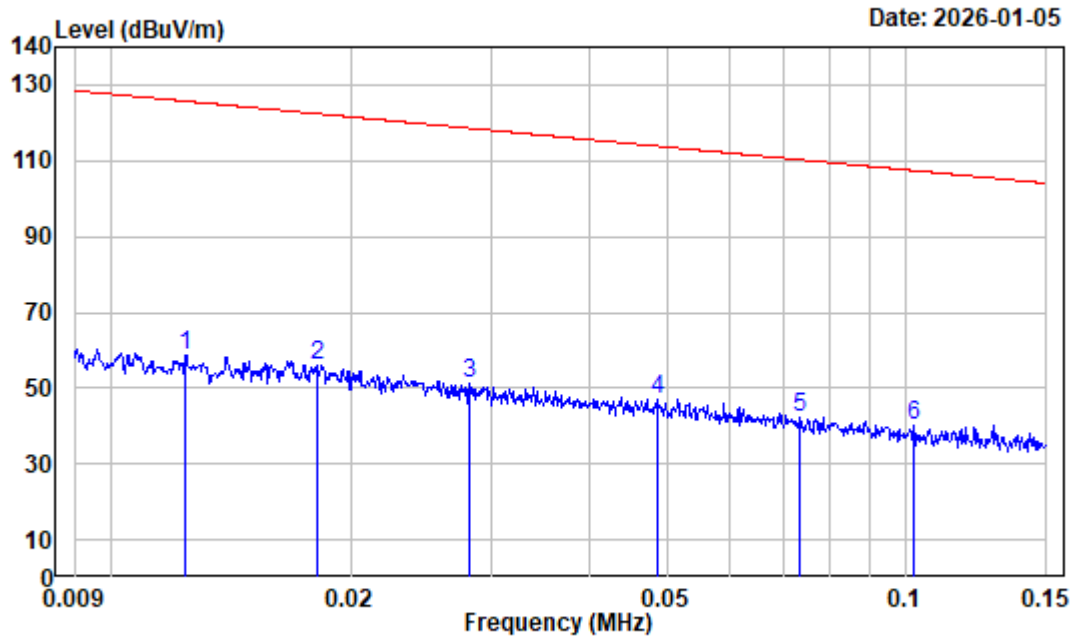
9kHz~30MHz:

With card



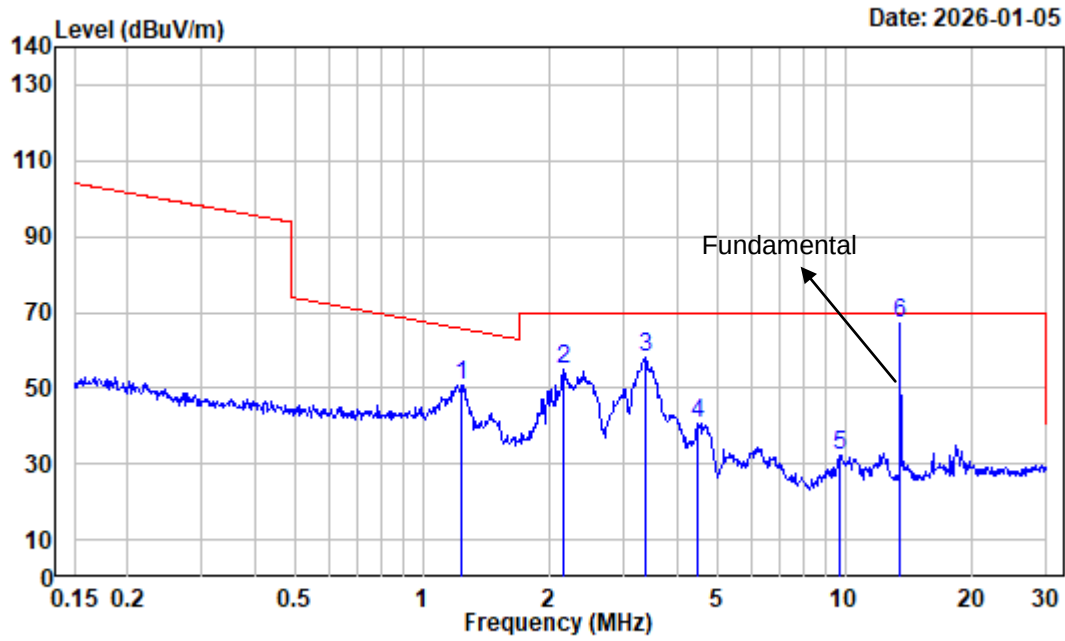
Site : chamber
Condition : 3m
Job No. : 2504Z27522E-RF
Polarization : Parallel Tester: Jayden Luo
Test Mode : NFC Transmitting
Note : with card
Receiver Setting: RBW:10kHz VBW:30kHz

	Freq		Read		Limit	Over	Remark
	Factor		Level	Level	Line	Limit	
	MHz	dB/m	dBuV	dBuV/m	dBuV/m	dB	
1	13.560	-4.41	71.45	67.04	124.00	-56.96	Peak



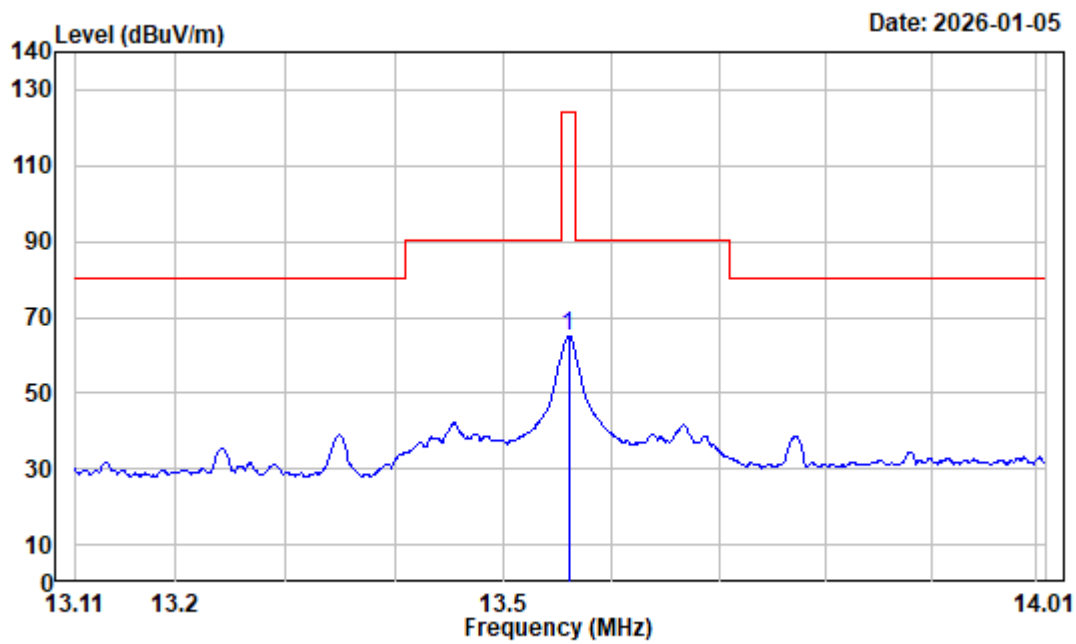
Site : chamber
Condition : 3m
Job No. : 2504Z27522E-RF
Polarization : Parallel Tester: Jayden Luo
Test Mode : NFC Transmitting
Note : with card
Receiver Setting: RBW:300Hz VBW:1kHz

	Freq Factor		Read	Limit	Over	Remark
	MHz	dB/m	Level	Level	Line	
	MHz	dB/m	dBuV	dBuV/m	dBuV/m	dB
1	0.012	34.76	23.83	58.59	125.73	-67.14 Peak
2	0.018	32.20	23.64	55.84	122.41	-66.57 Peak
3	0.028	27.71	23.42	51.13	118.57	-67.44 Peak
4	0.049	23.08	23.84	46.92	113.86	-66.94 Peak
5	0.073	19.46	23.05	42.51	110.29	-67.78 Peak
6	0.102	16.33	23.84	40.17	107.41	-67.24 Peak



Site : chamber
Condition : 3m
Job No. : 2504Z27522E-RF
Polarization : Parallel Tester: Jayden Luo
Test Mode : NFC Transmitting
Note : with card
Receiver Setting: RBW:10kHz VBW:30kHz

Freq Factor		Read Level	Level	Limit Line	Over Limit	Remark
MHz	dB/m	dBuV	dBuV/m	dBuV/m	dB	
1	1.242	-2.69	53.30	50.61	65.55	-14.94 Peak
2	2.167	-5.45	60.23	54.78	69.54	-14.76 Peak
3	3.381	-6.01	63.95	57.94	69.54	-11.60 Peak
4	4.478	-6.30	47.00	40.70	69.54	-28.84 Peak
5	9.757	-5.39	37.74	32.35	69.54	-37.19 Peak
6	13.551	-4.41	71.34	66.93	69.54	-2.61 Peak



Site : chamber

Condition : 3m

Job No. : 2504Z27522E-RF

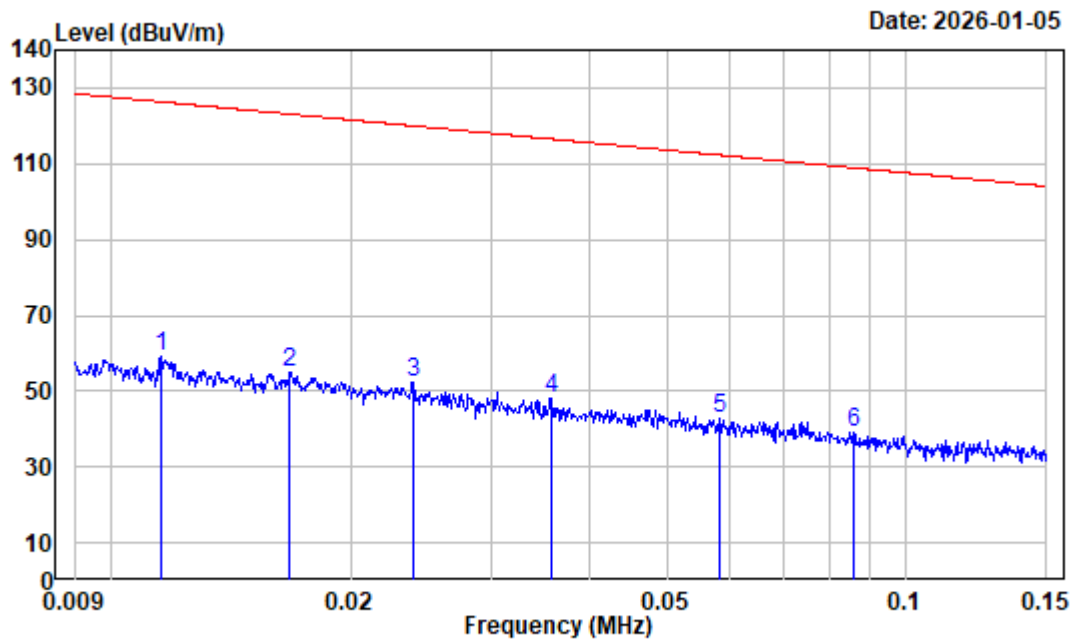
Polarization : Perpendicular Tester: Jayden Luo

Test Mode : NFC Transmitting

Note : with card

Receiver Setting: RBW:10kHz VBW:30kHz

Freq Factor		Read Level	Level	Limit Line	Over Limit	Remark
MHz	dB/m	dBuV	dBuV/m	dBuV/m	dB	
1	13.560	-4.41	69.57	65.16	124.00	-58.84 Peak



Site : chamber

Condition : 3m

Job No. : 2504Z27522E-RF

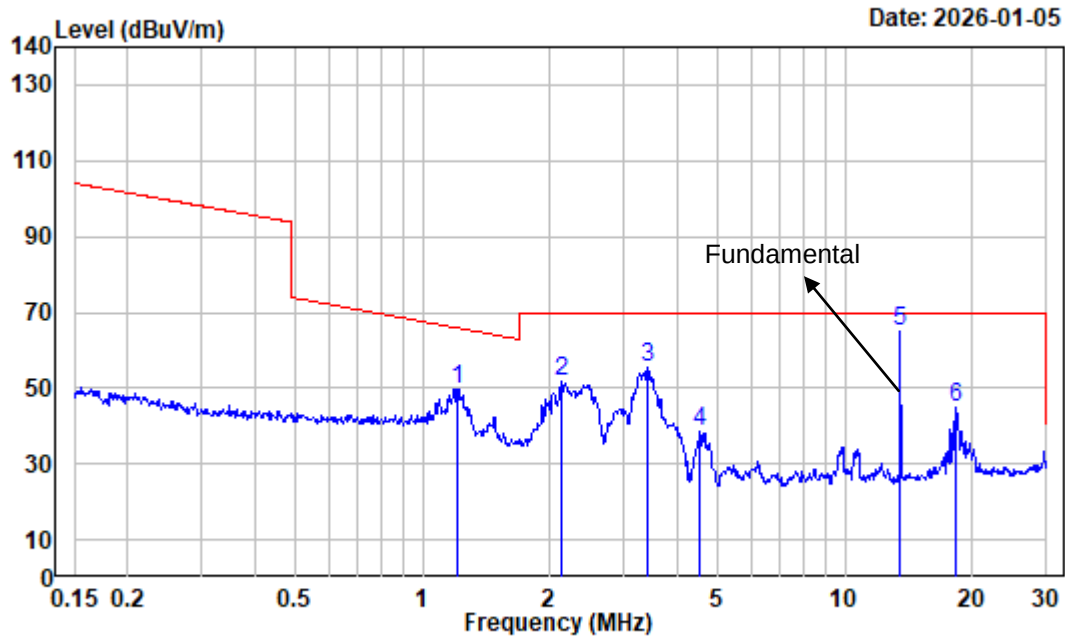
Polarization : Perpendicular Tester: Jayden Luo

Test Mode : NFC Transmitting

Note : with card

Receiver Setting: RBW:300Hz VBW:1kHz

	Freq Factor		Read Level	Level	Limit	Over	Remark
	MHz	dB/m	dBuV	dBuV/m	dBuV/m	dB	
1	0.012	35.14	23.95	59.09	126.35	-67.26	Peak
2	0.017	32.83	22.29	55.12	123.12	-68.00	Peak
3	0.024	29.63	22.46	52.09	120.02	-67.93	Peak
4	0.036	25.77	22.44	48.21	116.55	-68.34	Peak
5	0.058	21.65	21.10	42.75	112.32	-69.57	Peak
6	0.086	17.91	21.01	38.92	108.92	-70.00	Peak



Site : chamber

Condition : 3m

Job No. : 2504Z27522E-RF

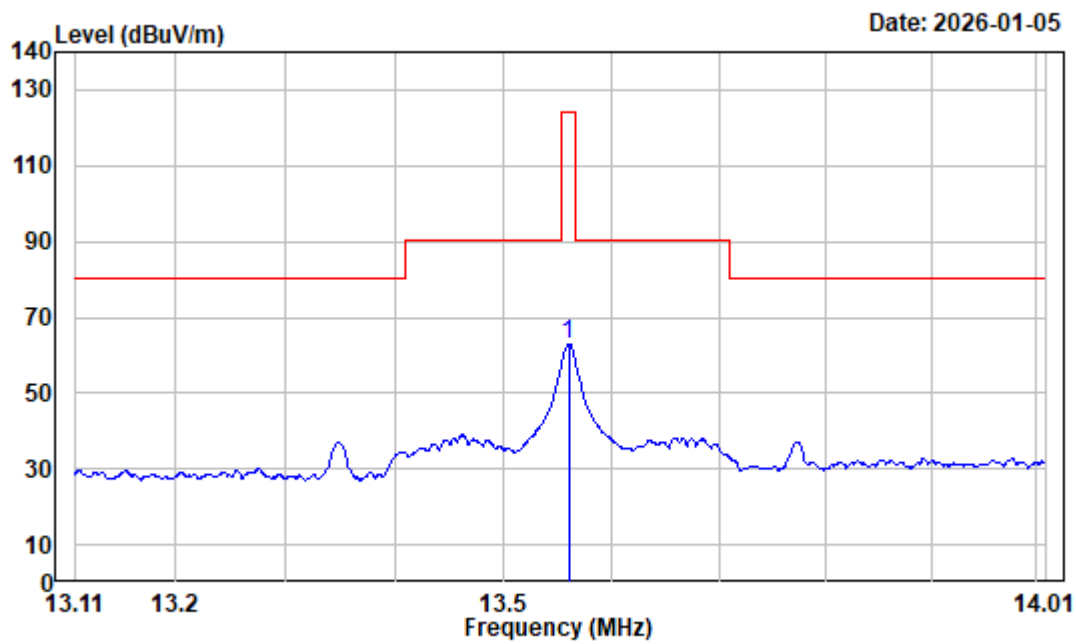
Polarization : Perpendicular Tester: Jayden Luo

Test Mode : NFC Transmitting

Note : with card

Receiver Setting: RBW:10kHz VBW:30kHz

	Freq	Factor	Read Level	Level	Limit	Over	Remark
	MHz	dB/m	dBuV	dBuV/m	dBuV/m	dB	
1	1.210	-2.58	52.28	49.70	65.78	-16.08	Peak
2	2.144	-5.44	57.28	51.84	69.54	-17.70	Peak
3	3.417	-6.03	61.57	55.54	69.54	-14.00	Peak
4	4.549	-6.30	44.62	38.32	69.54	-31.22	Peak
5	13.551	-4.41	69.50	65.09	69.54	-4.45	Peak
6	18.328	-3.73	48.61	44.88	69.54	-24.66	Peak



Site : chamber

Condition : 3m

Job No. : 2504Z27522E-RF

Polarization : Ground-parallel

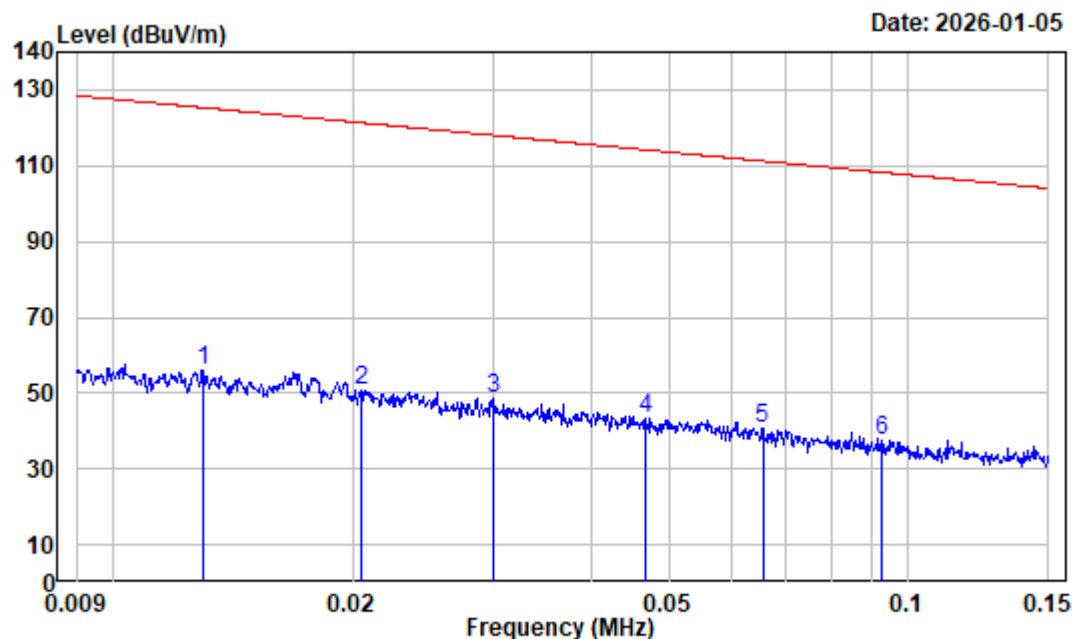
Test Mode : NFC Transmitting

Note : with card

Receiver Setting: RBW:10kHz VBW:30kHz

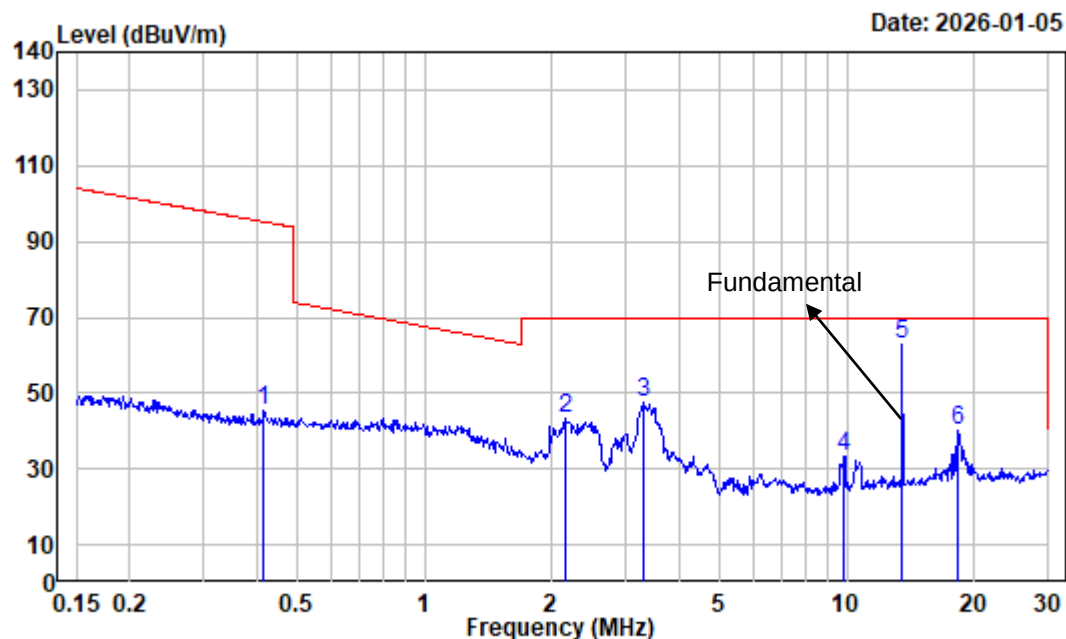
Tester: Jayden Luo

Freq Factor		Read Level	Level	Limit Line	Over Limit	Remark
MHz	dB/m	dBuV	dBuV/m	dBuV/m	dB	
1	13.560	-4.41	67.50	63.09	124.00	-60.91 Peak



Site : chamber
Condition : 3m
Job No. : 2504Z27522E-RF
Polarization : Ground-parallel Tester: Jayden Luo
Test Mode : NFC Transmitting
Note : with card
Receiver Setting: RBW:300Hz VBW:1kHz

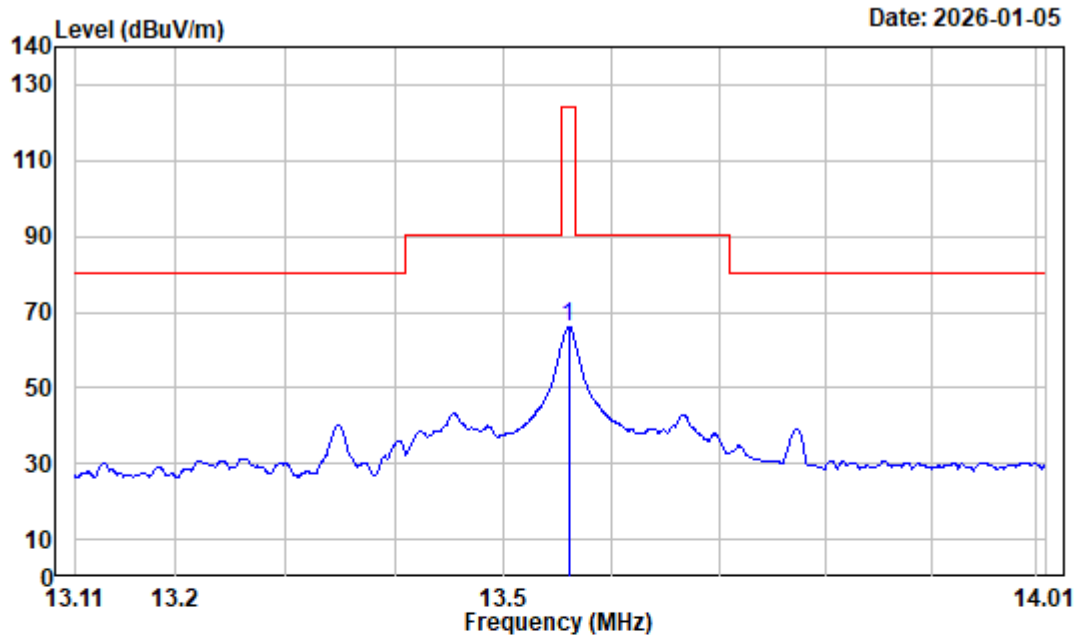
	Freq	Factor	Read Level	Level	Limit Line	Over Limit	Remark
	MHz	dB/m	dBuV	dBuV/m	dBuV/m	dB	
1	0.013	34.51	21.62	56.13	125.34	-69.21	Peak
2	0.021	31.13	19.79	50.92	121.34	-70.42	Peak
3	0.030	26.93	21.56	48.49	118.04	-69.55	Peak
4	0.047	23.48	20.00	43.48	114.20	-70.72	Peak
5	0.066	20.58	20.30	40.88	111.27	-70.39	Peak
6	0.093	17.20	20.30	37.50	108.26	-70.76	Peak



Site : chamber
 Condition : 3m
 Job No. : 2504Z27522E-RF
 Polarization : Ground-parallel Tester: Jayden Luo
 Test Mode : NFC Transmitting
 Note : with card
 Receiver Setting: RBW:10kHz VBW:30kHz

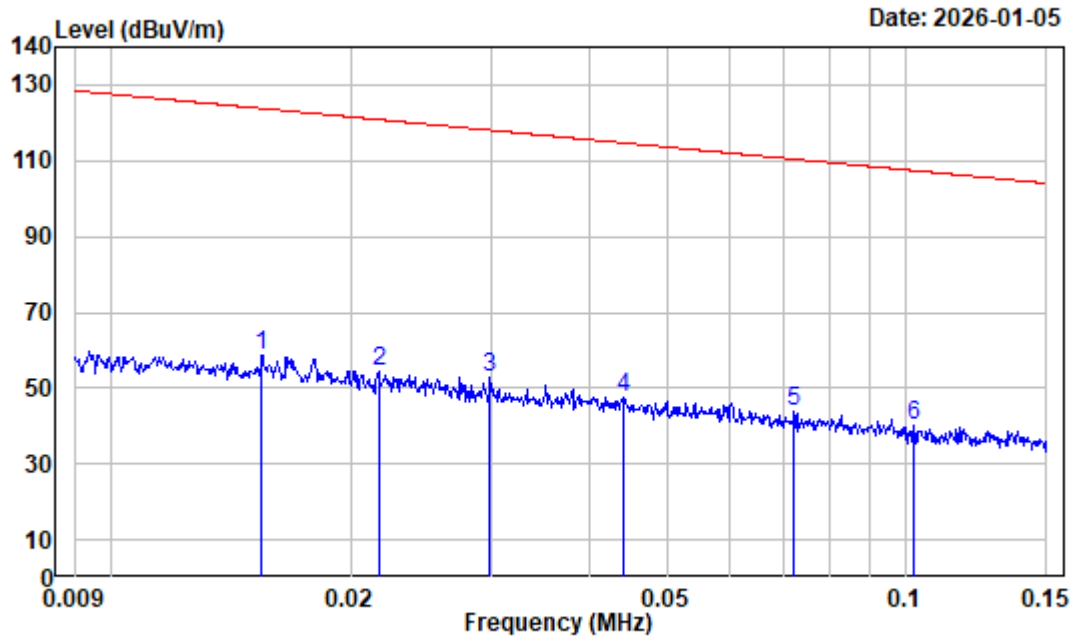
	Freq	Factor	Read Level	Level	Limit Line	Over Limit	Remark
	MHz	dB/m	dBuV	dBuV/m	dBuV/m	dB	
1	0.417	4.94	40.35	45.29	95.20	-49.91	Peak
2	2.167	-5.45	48.80	43.35	69.54	-26.19	Peak
3	3.293	-5.97	53.78	47.81	69.54	-21.73	Peak
4	9.861	-5.36	38.82	33.46	69.54	-36.08	Peak
5	13.551	-4.41	67.37	62.96	69.54	-6.58	Peak
6	18.328	-3.73	44.10	40.37	69.54	-29.17	Peak

Without card



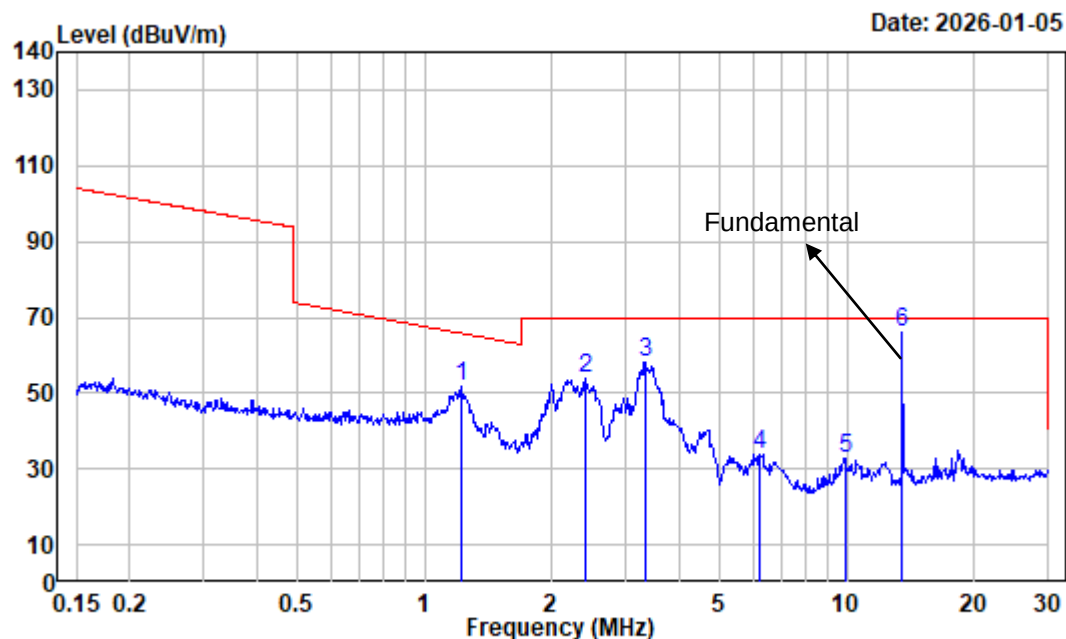
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Note : without card
Receiver Setting: RBW:10kHz VBW:30kHz

	Freq	Factor	Read Level	Level	Limit Line	Over Limit	Remark
	MHz	dB/m	dBuV	dBuV/m	dBuV/m	dB	
1	13.560	-4.41	70.58	66.17	124.00	-57.83	Peak



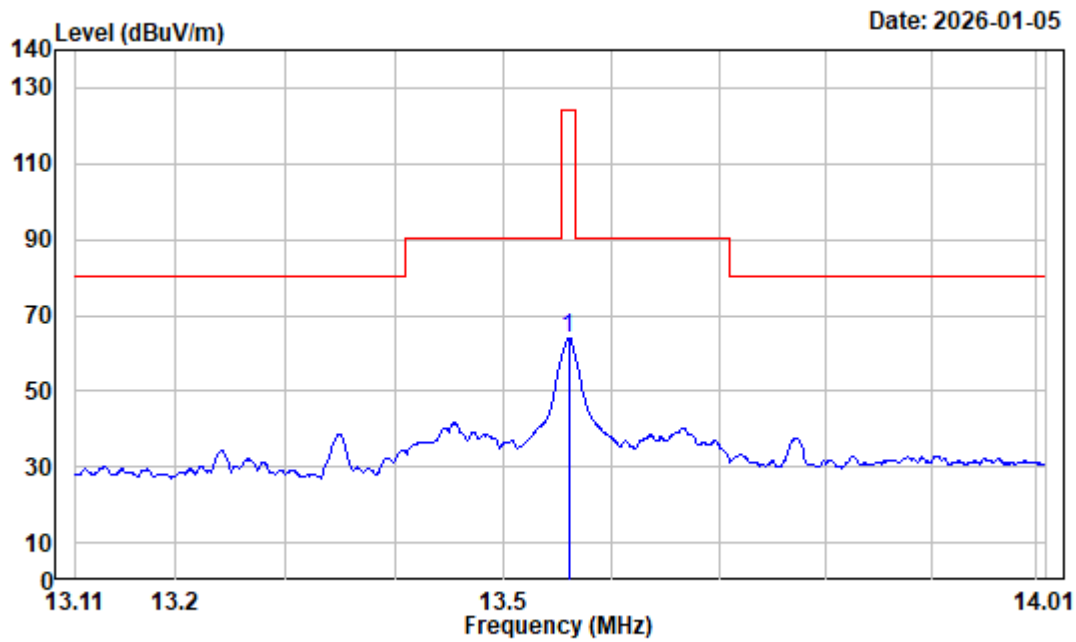
Site : chamber
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Test Mode : NFC Transmitting
Note : without card
Receiver Setting: RBW:300Hz VBW:1kHz

Freq Factor		Read Level	Level	Limit Line	Over Limit	Remark
MHz	dB/m	dBuV	dBuV/m	dBuV/m	dB	
1	0.015	33.40	25.37	58.77	123.80	-65.03 Peak
2	0.022	30.63	23.57	54.20	120.87	-66.67 Peak
3	0.030	26.99	25.97	52.96	118.09	-65.13 Peak
4	0.044	24.03	23.48	47.51	114.71	-67.20 Peak
5	0.072	19.64	24.38	44.02	110.44	-66.42 Peak
6	0.102	16.33	23.84	40.17	107.41	-67.24 Peak



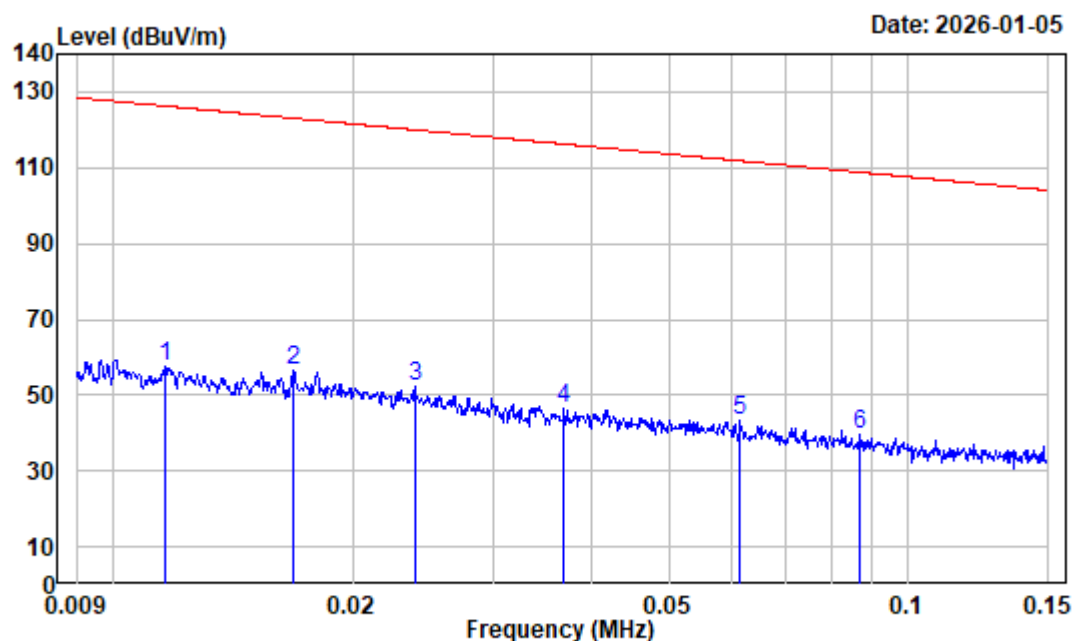
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Note : without card
Receiver Setting: RBW:10kHz VBW:30kHz

	Freq	Factor	Read Level	Level	Limit Line	Over Limit	Remark
	MHz	dB/m	dBuV	dBuV/m	dBuV/m	dB	
1	1.223	-2.62	54.63	52.01	65.69	-13.68	Peak
2	2.396	-5.56	59.21	53.65	69.54	-15.89	Peak
3	3.328	-5.98	63.95	57.97	69.54	-11.57	Peak
4	6.219	-6.17	40.16	33.99	69.54	-35.55	Peak
5	9.913	-5.35	38.26	32.91	69.54	-36.63	Peak
6	13.551	-4.41	70.51	66.10	69.54	-3.44	Peak



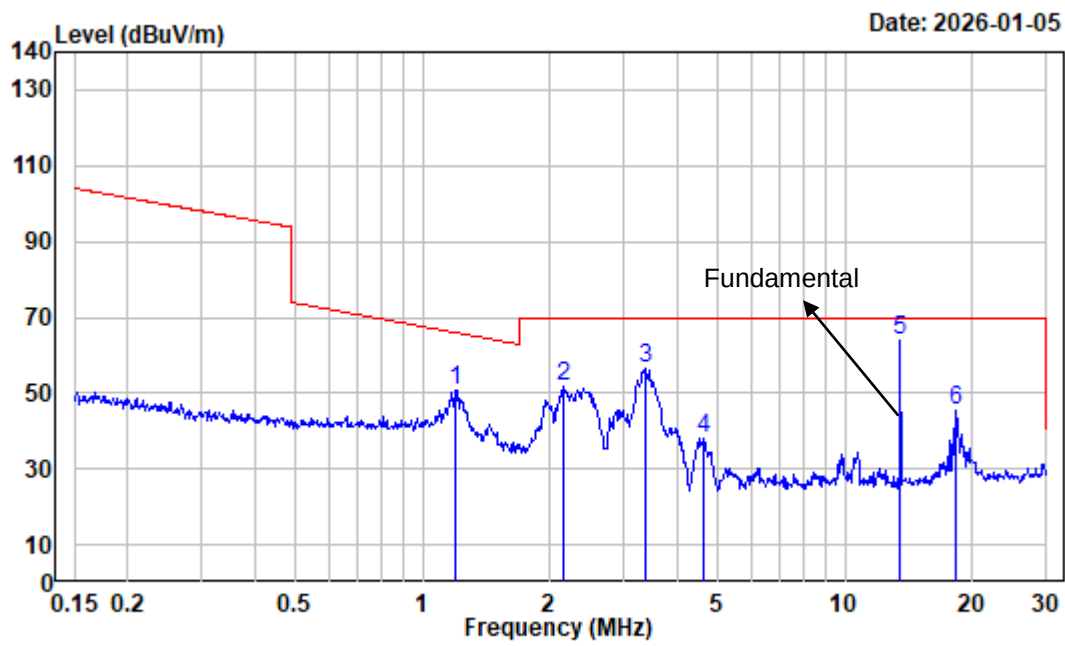
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Condition : 3m
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Polarization : Perpendicular Tester: Jayden Luo
Test Mode : NFC Transmitting
Note : without card
Receiver Setting: RBW:10kHz VBW:30kHz

Freq Factor		Read Level	Level	Limit Line	Over Limit	Remark
MHz	dB/m	dBuV	dBuV/m	dBuV/m	dB	
1	13.560	-4.41	68.32	63.91	124.00	-60.09 Peak



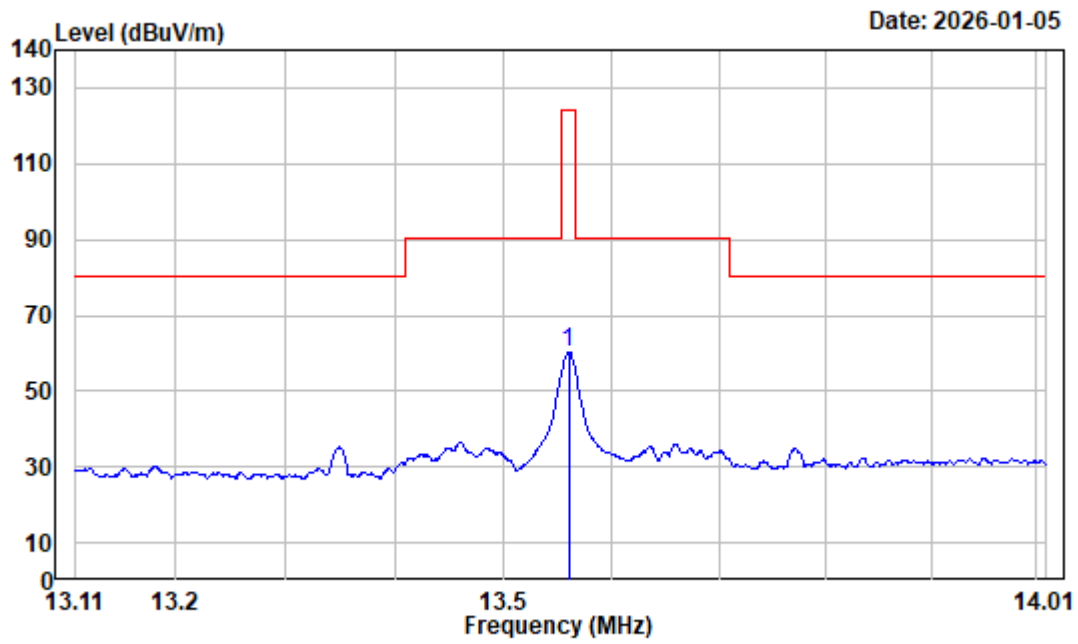
Site : chamber
Condition : 3m
Job No. : 2504Z27522E-RF
Polarization : Perpendicular Tester: Jayden Luo
Test Mode : NFC Transmitting
Note : without card
Receiver Setting: RBW:300Hz VBW:1kHz

	Freq	Factor	Read Level	Level	Limit Line	Over Limit	Remark
	MHz	dB/m	dBuV	dBuV/m	dBuV/m	dB	
1	0.012	35.09	22.71	57.80	126.27	-68.47	Peak
2	0.017	32.77	23.69	56.46	123.05	-66.59	Peak
3	0.024	29.63	22.52	52.15	120.02	-67.87	Peak
4	0.037	25.54	20.81	46.35	116.28	-69.93	Peak
5	0.061	21.17	22.01	43.18	111.83	-68.65	Peak
6	0.087	17.80	21.96	39.76	108.82	-69.06	Peak



Site : chamber
Condition : 3m
Job No. : 2504Z27522E-RF
Polarization : Perpendicular Tester: Jayden Luo
Test Mode : NFC Transmitting
Note : without card
Receiver Setting: RBW:10kHz VBW:30kHz

Freq Factor		Read Level	Level	Limit Line	Over Limit	Remark
MHz	dB/m	dBuV	dBuV/m	dBuV/m	dB	
1	1.197	-2.53	53.39	50.86	65.88	-15.02 Peak
2	2.167	-5.45	57.32	51.87	69.54	-17.67 Peak
3	3.364	-6.00	62.79	56.79	69.54	-12.75 Peak
4	4.647	-6.30	44.24	37.94	69.54	-31.60 Peak
5	13.551	-4.41	68.20	63.79	69.54	-5.75 Peak
6	18.328	-3.73	49.28	45.55	69.54	-23.99 Peak



Site

Condition

Job No.

Polarization

Test Mode

Note

Receiver Setting:

: chamber

: 3m

: 2504Z27522E-RF

: Ground-parallel

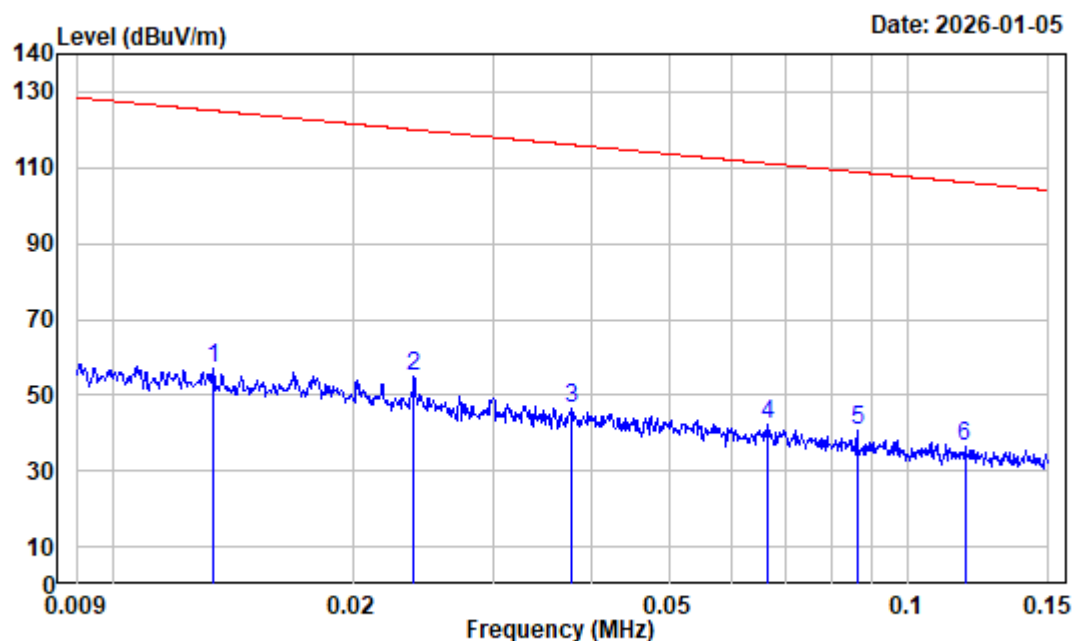
: NFC Transmitting

: without card

RBW:10kHz VBW:30kHz

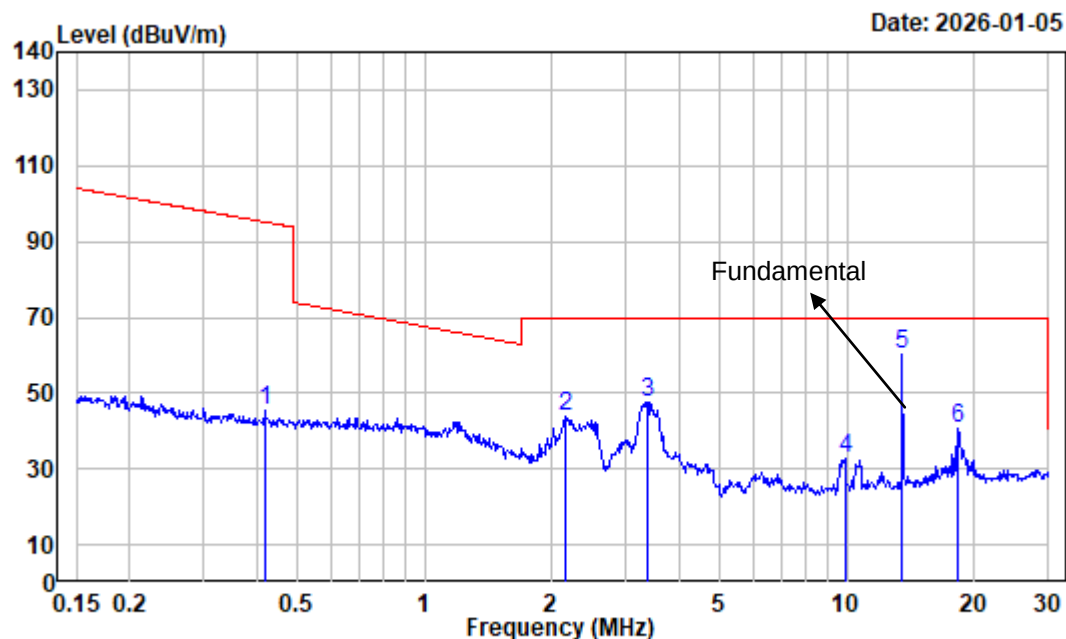
Tester: Jayden Luo

Freq Factor		Read Level	Level	Limit Line	Over Limit	Remark
MHz	dB/m	dBuV	dBuV/m	dBuV/m	dB	
1	13.560	-4.41	64.69	60.28	124.00	-63.72 Peak



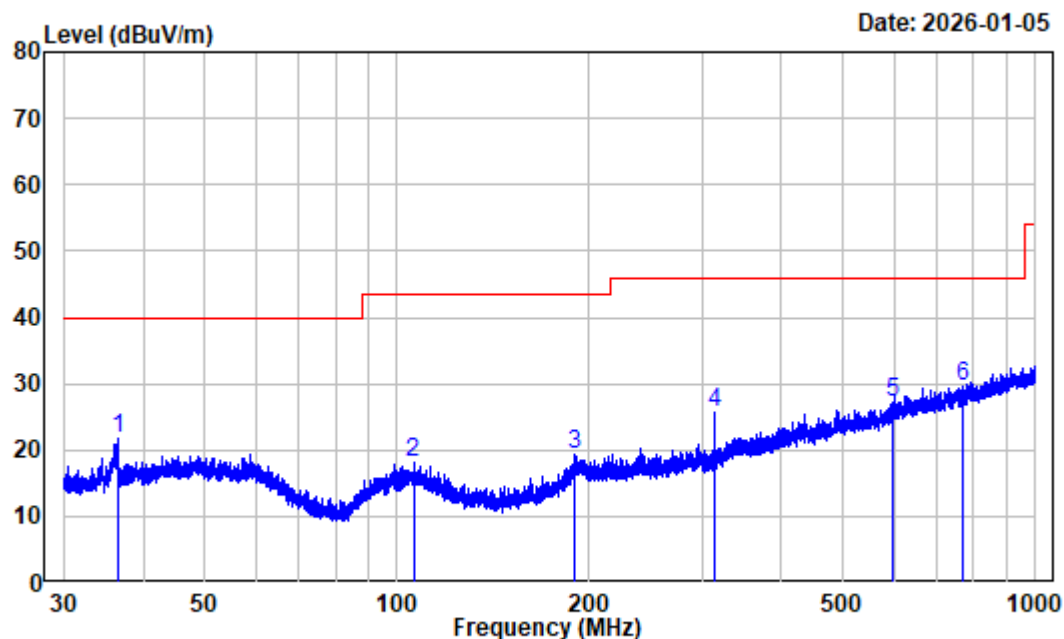
Site : chamber
Condition : 3m
Job No. : 2504Z27522E-RF
Polarization : Ground-parallel Tester: Jayden Luo
Test Mode : NFC Transmitting
Note : without card
Receiver Setting: RBW:300Hz VBW:1kHz

	Freq	Factor	Read Level	Level	Limit Line	Over Limit	Remark
	MHz	dB/m	dBuV	dBuV/m	dBuV/m	dB	
1	0.013	34.34	22.75	57.09	125.10	-68.01	Peak
2	0.024	29.66	25.28	54.94	120.04	-65.10	Peak
3	0.038	25.33	21.11	46.44	116.06	-69.62	Peak
4	0.067	20.45	21.58	42.03	111.14	-69.11	Peak
5	0.086	17.88	22.58	40.46	108.90	-68.44	Peak
6	0.118	15.63	20.77	36.40	106.18	-69.78	Peak



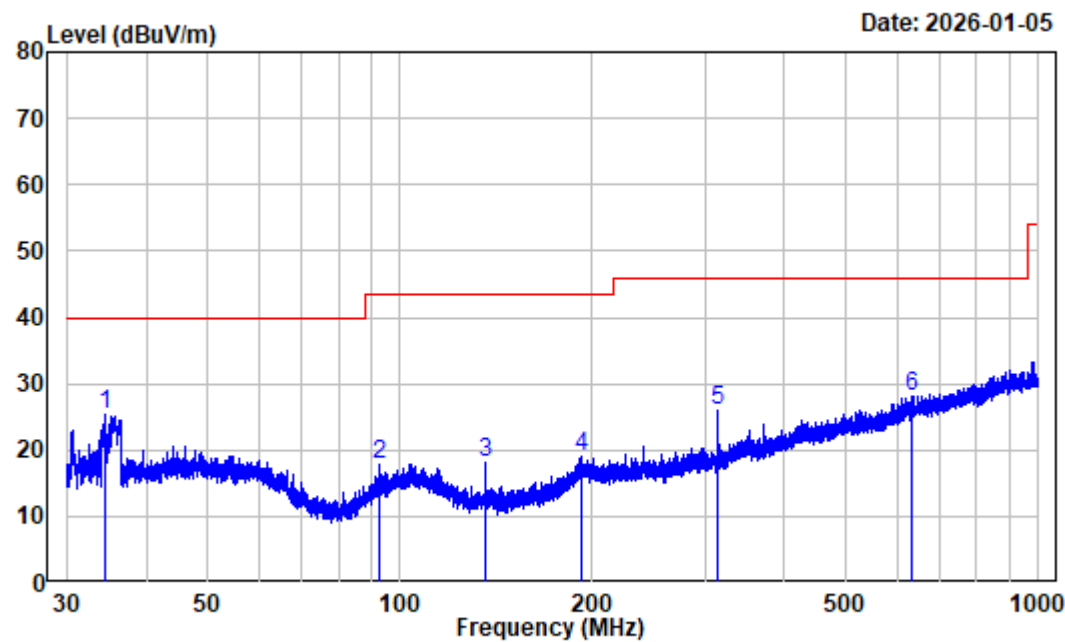
Site : chamber
 Condition : 3m
 Job No. : 2504Z27522E-RF
 Polarization : Ground-parallel Tester: Jayden Luo
 Test Mode : NFC Transmitting
 Note : without card
 Receiver Setting: RBW:10kHz VBW:30kHz

	Freq Factor		Read Level	Level	Limit Line	Over Limit	Remark
	MHz	dB/m	dBuV	dBuV/m	dBuV/m	dB	
1	0.419	4.89	40.37	45.26	95.15	-49.89	Peak
2	2.155	-5.45	49.23	43.78	69.54	-25.76	Peak
3	3.364	-6.00	53.62	47.62	69.54	-21.92	Peak
4	9.913	-5.35	37.94	32.59	69.54	-36.95	Peak
5	13.551	-4.41	64.59	60.18	69.54	-9.36	Peak
6	18.328	-3.73	44.24	40.51	69.54	-29.03	Peak

**30MHz~1GHz:
With card**

Site : chamber
Condition : 3m HORIZONTAL
Job No. : 2504Z27522E-RF Tester: Jayden Luo
Test Mode : NFC Transmitting
Note : with card
Receiver Setting: RBW:100kHz VBW:300kHz

	Freq Factor		Read	Limit	Over	Remark
	MHz	dB/m	Level	Level	Limit	
	MHz	dB/m	dBuV	dBuV/m	dBuV/m	dB
1	36.493	-11.36	33.10	21.74	40.00	-18.26 Peak
2	106.013	-11.13	29.20	18.07	43.50	-25.43 Peak
3	190.072	-10.37	29.59	19.22	43.50	-24.28 Peak
4	314.928	-8.62	34.37	25.75	46.00	-20.25 Peak
5	597.747	-2.09	29.14	27.05	46.00	-18.95 Peak
6	771.449	0.40	29.19	29.59	46.00	-16.41 Peak



Site : chamber

Condition : 3m VERTICAL

Job No. : 2504Z27522E-RF Tester: Jayden Luo

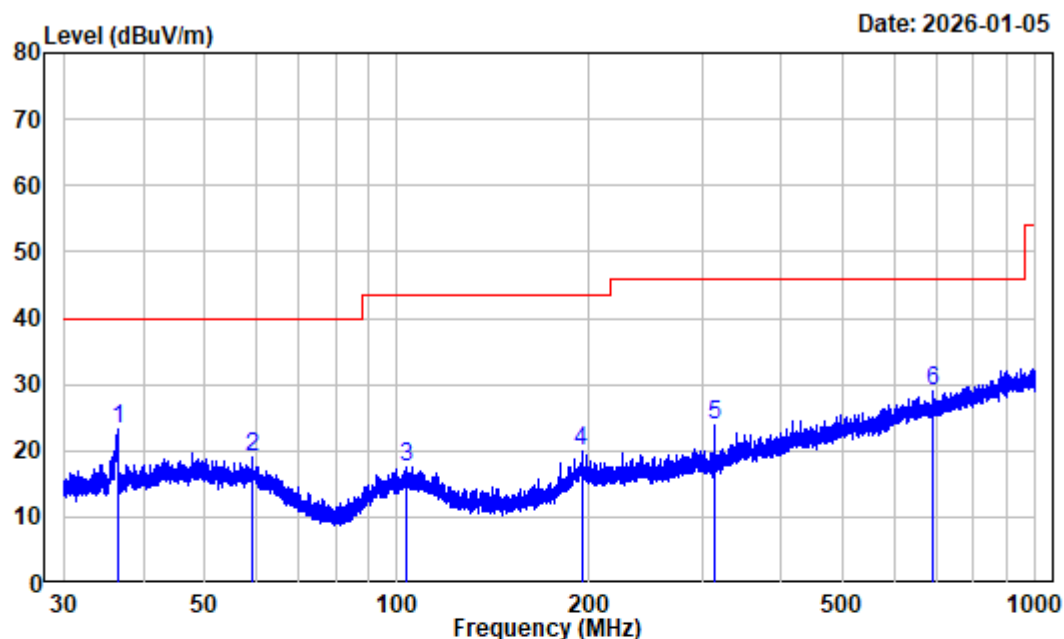
Test Mode : NFC Transmitting

Note : with card

Receiver Setting: RBW:100kHz VBW:300kHz

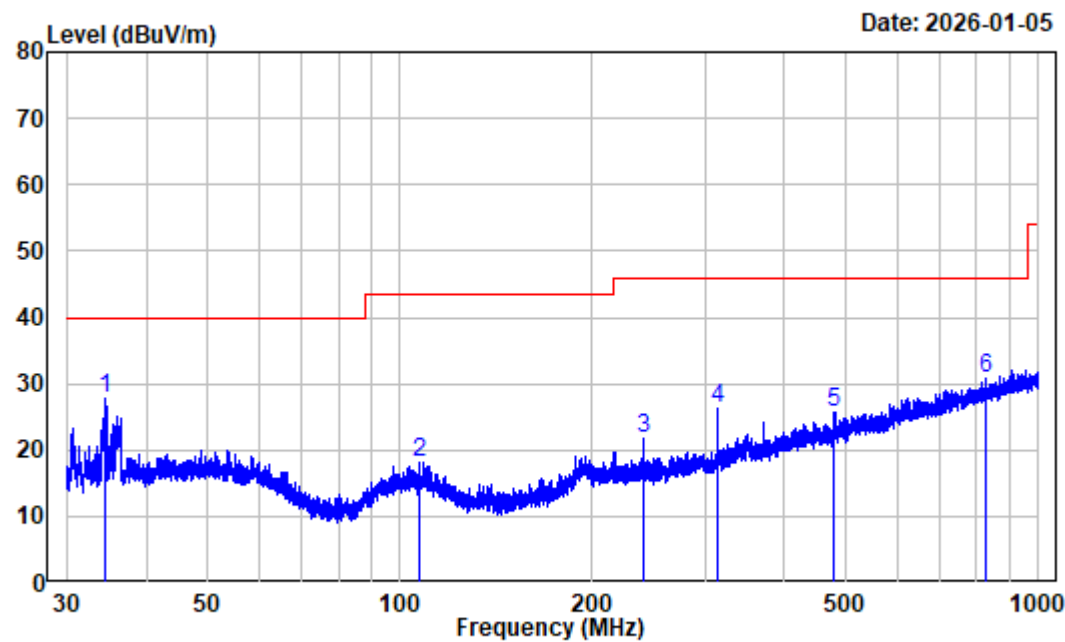
	Freq	Factor	Read Level	Level	Limit Line	Over Limit	Remark
	MHz	dB/m	dBuV	dBuV/m	dBuV/m	dB	
1	34.517	-11.67	37.15	25.48	40.00	-14.52	Peak
2	92.665	-12.86	30.75	17.89	43.50	-25.61	Peak
3	135.625	-14.43	32.43	18.00	43.50	-25.50	Peak
4	191.913	-10.18	29.31	19.13	43.50	-24.37	Peak
5	314.928	-8.62	34.49	25.87	46.00	-20.13	Peak
6	633.630	-1.62	29.70	28.08	46.00	-17.92	Peak

Without card



Site : chamber
Condition : 3m HORIZONTAL
Job No. : 2504Z27522E-RF Tester: Jayden Luo
Test Mode : NFC Transmitting
Note : without card
Receiver Setting: RBW:100kHz VBW:300kHz

	Freq Factor		Read Level	Level	Limit Line	Over Limit	Remark
	MHz	dB/m	dBuV	dBuV/m	dBuV/m	dB	
1	36.445	-11.36	34.69	23.33	40.00	-16.67	Peak
2	59.232	-10.23	29.31	19.08	40.00	-20.92	Peak
3	103.488	-11.19	28.77	17.58	43.50	-25.92	Peak
4	194.453	-9.86	29.68	19.82	43.50	-23.68	Peak
5	314.928	-8.62	32.51	23.89	46.00	-22.11	Peak
6	688.357	-1.15	30.16	29.01	46.00	-16.99	Peak



Site : chamber

Condition : 3m VERTICAL

Job No. : 2504Z27522E-RF Tester: Jayden Luo

Test Mode : NFC Transmitting

Note : without card

Receiver Setting: RBW:100kHz VBW:300kHz

	Freq	Factor	Read Level	Level	Limit Line	Over Limit	Remark
	MHz	dB/m	dBuV	dBuV/m	dBuV/m	dB	
1	34.608	-11.65	39.35	27.70	40.00	-12.30	Peak
2	107.369	-11.20	29.46	18.26	43.50	-25.24	Peak
3	239.987	-10.06	31.77	21.71	46.00	-24.29	Peak
4	314.928	-8.62	34.82	26.20	46.00	-19.80	Peak
5	479.476	-4.41	30.21	25.80	46.00	-20.20	Peak
6	824.597	0.49	30.17	30.66	46.00	-15.34	Peak

FREQUENCY STABILITY

Applicable Standard

According to FCC§15.225(e):

The frequency tolerance of the carrier signal shall be maintained within $\pm 0.01\%$ of the operating frequency over a temperature variation of -20 degrees to $+50$ degrees C at normal supply voltage, and for a variation in the primary supply voltage from 85% to 115% of the rated supply voltage at a temperature of 20 degrees C. For battery operated equipment, the equipment tests shall be performed using a new battery.

Test Procedure

According to ANSI C63.10-2020 Section 6.8

Frequency stability with respect to ambient temperature

a) Supply the EUT with a nominal ac voltage or install a new or fully charged battery in the EUT. If possible, a dummy load shall be connected to the EUT because an antenna near the metallic walls of an environmental test chamber could affect the output frequency of the EUT. If the EUT is equipped with a permanently attached, adjustable-length antenna, then the EUT shall be placed in the center of the chamber with the antenna adjusted to the shortest length possible. Turn ON the EUT and tune it to one of the number of frequencies shown in 5.6.

b) Couple the unlicensed wireless device output to the measuring instrument by connecting an antenna to the measuring instrument with a suitable length of coaxial cable and placing the measuring antenna near the EUT (e.g., 15 cm away), or b connecting a dummy load to the measuring instrument, through an attenuator if necessary.

NOTE—An instrument that has an adequate level of accuracy as specified by the procuring or regulatory agency is the recommended measuring instrument.

c) Adjust the location of the measurement antenna and the controls on the measurement instrument to obtain a suitable signal level (i.e., a level that will not overload the measurement instrument but is strong enough to allow measurement of the operating or fundamental frequency of the EUT).

d) Turn the EUT OFF and place it inside the environmental temperature chamber. For devices that have oscillator heaters, energize only the heater circuit.

e) Set the temperature control on the chamber to the highest specified in the regulatory requirements for the type of device and allow the oscillator heater and the chamber temperature to stabilize.

f) While maintaining a constant temperature inside the environmental chamber, turn the EUT ON and record the operating frequency at startup, and at 2 minutes, 5 minutes, and 10 minutes after the EUT is energized. Four measurements in total are made.

g) Measure the frequency at each of frequencies specified in 5.6.

h) Switch OFF the EUT but do not switch OFF the oscillator heater.

i) Lower the chamber temperature by not more than 10°C , and allow the temperature inside the chamber to stabilize.

j) Repeat step f) through step i) down to the lowest specified temperature.

Frequency stability when varying supply voltage

Unless otherwise specified, these tests shall be made at ambient room temperature (+15 °C to +25 °C). An antenna shall be connected to the antenna output terminals of the EUT if possible. If the EUT is equipped with or uses an adjustable-length antenna, then it shall be fully extended.

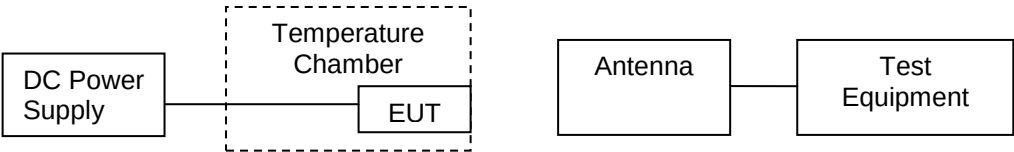
- a) Supply the EUT with nominal voltage or install a new or fully charged battery in the EUT. Turn ON the EUT and couple its output to a frequency counter or other frequency-measuring instrument. NOTE—An instrument that has an adequate level of accuracy as specified by the procuring or regulatory agency is the recommended measuring instrument.
- b) Tune the EUT to one of the number of frequencies required in 5.6. Adjust the location of the measurement antenna and the controls on the measurement instrument to obtain a suitable signal level (i.e., a level that will not overload the measurement instrument but is strong enough to allow measurement of the operating or fundamental frequency of the EUT).
- c) Measure the frequency at each of the frequencies specified in 5.6. d) Repeat the above procedure at 85% and 115% of the nominal supply voltage as described in 5.13.

Frequency Stability vs. Temperature: The equipment under test was connected to an external DC power supply and inductive antenna was connected to a Spectrum Analyzer. The EUT was placed inside the temperature chamber.

After the temperature stabilized for approximately 20 minutes, the frequency output was recorded from the Spectrum Analyzer.

Frequency Stability vs. Voltage: An external DC power supply Source. The voltage was set to 115% of the nominal value and was then decreased until the transmitter light no longer illuminated; i.e., the end point. The output frequency was recorded for each voltage.

EUT Setup



Test Data

Environmental Conditions

Temperature:	21.2 °C
Relative Humidity:	50 %
ATM Pressure:	101.8 kPa

The testing was performed by Jayden Luo on 2026-01-05.

EUT operation mode: Transmitting(Radiated Measurement)

Test Result: Compliance. Please refer to the below data.

With Magnetic card

Test Item	Temperature# (°C)	Voltage# (V _{DC})	Measured frequency (MHz)	Frequency Error (%)	Limit (%)
Frequency Stability vs. Temperature	-20	6	13.56001274	0.00009	0.01
	-10		13.56008539	0.00063	0.01
	0		13.56004716	0.00035	0.01
	10		13.56002983	0.00022	0.01
	20		13.56007628	0.00056	0.01
	25		13.56009985	0.00074	0.01
	30		13.56005194	0.00038	0.01
	40		13.56003867	0.00029	0.01
	50		13.56006452	0.00048	0.01
Frequency Stability vs. Voltage	20	5.1	13.56009175	0.00068	0.01
	20	6.9	13.56002489	0.00018	0.01

Without Magnetic card

Test Item	Temperature# (°C)	Voltage# (V _{DC})	Measured frequency (MHz)	Frequency Error (%)	Limit (%)
Frequency Stability vs. Temperature	-20	6	13.56001278	0.00009	0.01
	-10		13.56008431	0.00062	0.01
	0		13.56004962	0.00037	0.01
	10		13.56002759	0.00020	0.01
	20		13.56007184	0.00053	0.01
	25		13.56009550	0.00070	0.01
	30		13.56005827	0.00043	0.01
	40		13.56003695	0.00027	0.01
	50		13.56006348	0.00047	0.01
Frequency Stability vs. Voltage	20	5.1	13.56009217	0.00068	0.01
	20	6.9	13.56004186	0.00031	0.01

Note: the extreme voltage was declared by the applicant.

20DB EMISSION BANDWIDTH

Requirement

According to FCC§15.215 (c):

Intentional radiators operating under the alternative provisions to the general emission limits, as contained in §§ 15.217 through 15.257 and in Subpart E of this part, must be designed to ensure that the 20 dB bandwidth of the emission, or whatever bandwidth may otherwise be specified in the specific rule section under which the equipment operates, is contained within the frequency band designated in the rule section under which the equipment is operated. The requirement to contain the designated bandwidth of the emission within the specified frequency band includes the effects from frequency sweeping, frequency hopping and other modulation techniques that may be employed as well as the frequency stability of the transmitter over expected variations in temperature and supply voltage. If a frequency stability is not specified in the regulations, it is recommended that the fundamental emission be kept within at least the central 80% of the permitted band in order to minimize the possibility of out-of-band operation.

Test Procedure

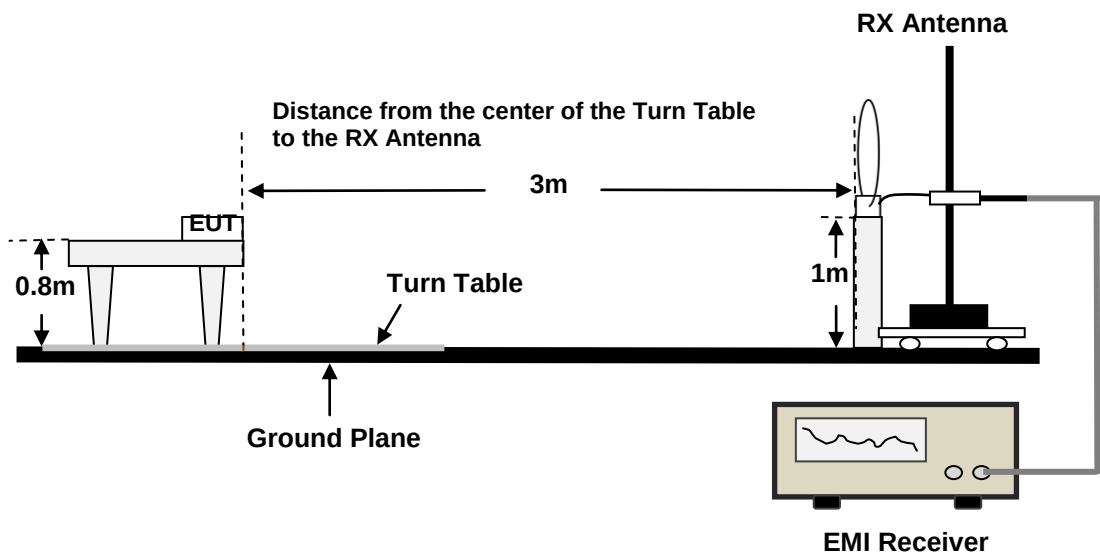
According to ANSI C63.10-2020 Section 6.9.2

- a) The spectrum analyzer center frequency is set to the nominal EUT channel center frequency. The span range for the EMI receiver or spectrum analyzer shall be between two times and five times the OBW.
- b) The nominal IF filter bandwidth (3 dB RBW) shall be in the range of 1% to 5% of the OBW and video bandwidth (VBW) shall be approximately three times RBW, unless otherwise specified by the applicable requirement.
- c) Set the reference level of the instrument as required, keeping the signal from exceeding the maximum input mixer level for linear operation. In general, the peak of the spectral envelope shall be more than $[10 \log (\text{OBW/RBW})]$ below the reference level. Specific guidance is given in 4.1.5.2 d) Steps a) through c) might require iteration to adjust within the specified tolerances.
- e) The dynamic range of the instrument at the selected RBW shall be more than 10 dB below the target “-xx dB down” requirement; that is, if the requirement calls for measuring the -20 dB OBW, the instrument noise floor at the selected RBW shall be at least 30 dB below the reference value.
- f) Set detection mode to peak and trace mode to max hold.
- g) Determine the reference value: Set the EUT to transmit an unmodulated carrier or modulated signal, as applicable. Allow the trace to stabilize. Set the spectrum analyzer marker to the highest level of the displayed trace (this is the reference value).
- h) Determine the “-xx dB down amplitude” using $[(\text{reference value}) - \text{xx}]$. Alternatively, this calculation may be made by using the marker-delta function of the instrument.
- i) If the reference value is determined by an unmodulated carrier, then turn the EUT modulation ON, and either clear the existing trace or start a new trace on the spectrum analyzer and allow the new trace to stabilize. Otherwise, the trace from step g) shall be used for step j).
- j) Place two markers, one at the lowest frequency and the other at the highest frequency of the envelope of the spectral display, such that each marker is at or slightly below the “-xx dB down amplitude” determined in step h). If a marker is below this “-xx dB down amplitude” value, then it shall be as close as possible to this value. The occupied bandwidth is the frequency difference between the two markers. Alternatively, set a marker at the lowest frequency of the envelope of the spectral display, such that the marker is at or slightly below the “-xx dB down amplitude” determined in step h). Reset the marker-delta function and move the marker to the other side of the emission until the delta marker amplitude is at the same level as the reference marker amplitude. The marker-delta frequency reading at this point is the specified emission bandwidth.

k) The occupied bandwidth shall be reported by providing plot(s) of the measuring instrument display; the plot axes and the scale units per division shall be clearly labeled. Tabular data may be reported in addition to the plot(s).

Measure the frequency difference of two frequencies that were attenuated 20 dB from the reference level.
Record the frequency difference as the emission bandwidth.

EUT Setup



Test Data

Environmental Conditions

Temperature:	21.2 °C
Relative Humidity:	50 %
ATM Pressure:	101.8 kPa

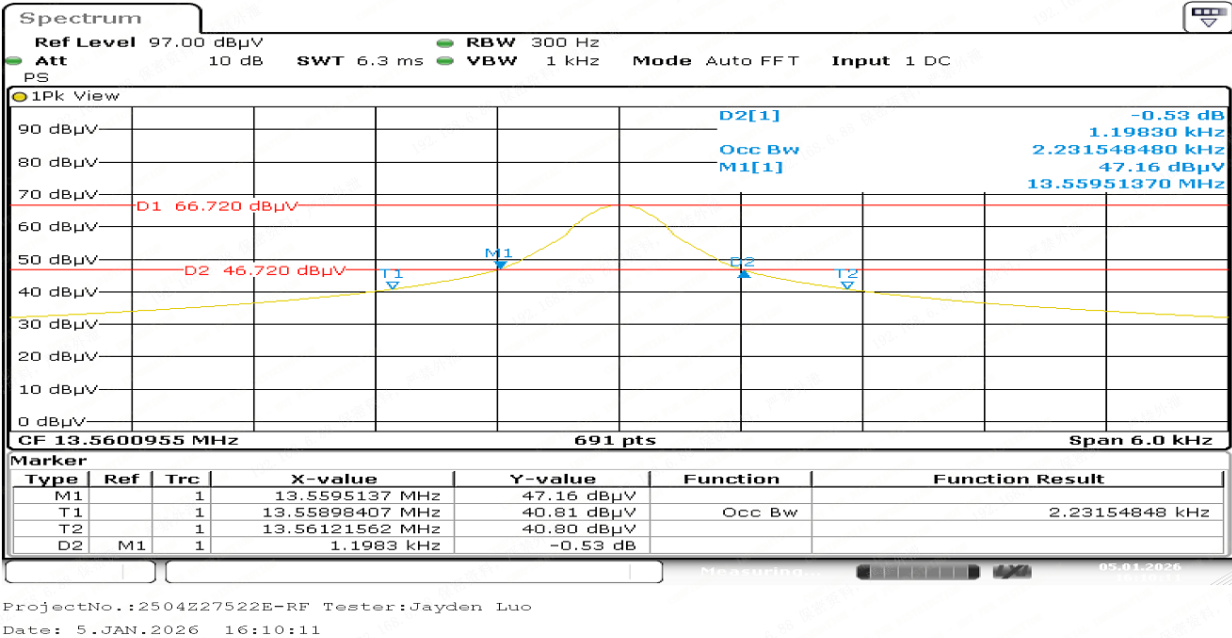
The testing was performed by Jayden Luo on 2026-01-05.

EUT operation mode: Transmitting(Radiated Measurement)

Test Result: Compliance. Please refer to the below data.

With Magnetic card

Frequency (MHz)	20 dB Bandwidth (kHz)
13.56	1.1983



Without Magnetic card

Frequency (MHz)	20 dB Bandwidth (kHz)
13.56	0.9204

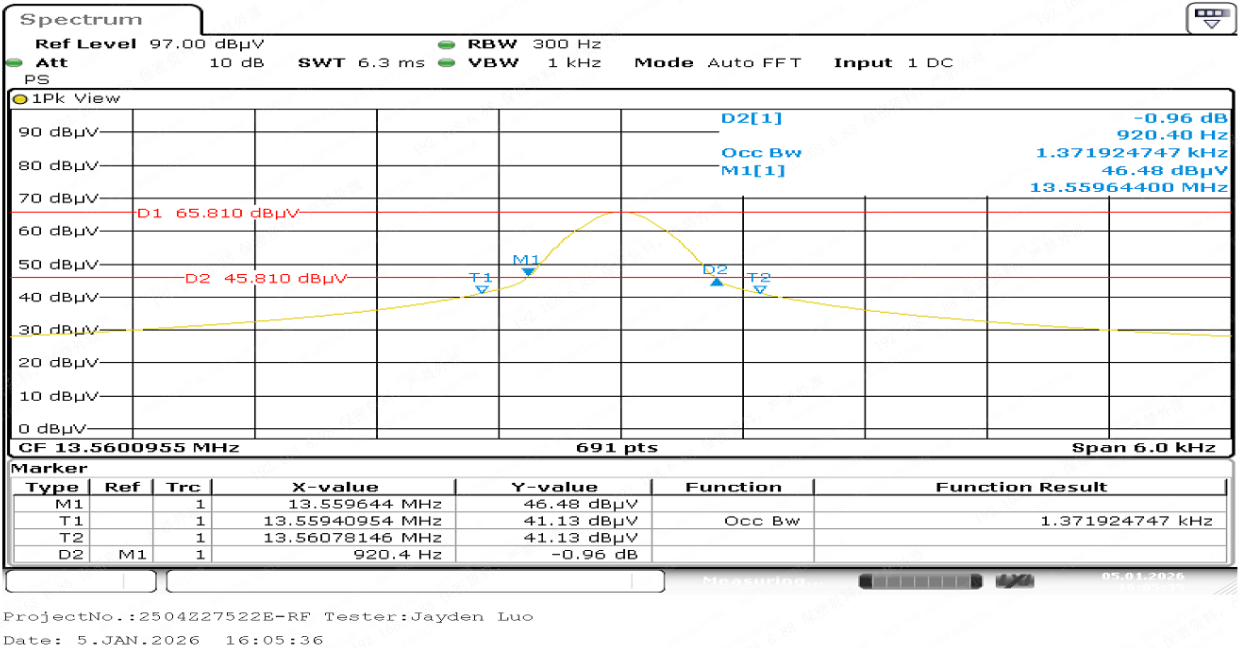


EXHIBIT A-EUT PHOTOGRAPHS

Please refer to the Attachment No.1 2504Z27522E-RF EUT External Photos and Attachment No.2 2504Z27522E-RF EUT Internal Photos.

EXHIBIT B-TEST SETUP PHOTOGRAPHS

Please refer to the Attachment No.4 2504Z27522E-RF-00B Test Photos.

***** END OF REPORT *****